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8 **IN THE UNITED STATES DISTRICT COURT**

9 **DISTRICT OF ARIZONA**

10 Carrie Ferrara Clark,

11 Plaintiff,

12 vs.

14 City of Tucson,

15 Defendant.

No. 4:14-CV-02543-TUC-CKJ

**DEFENDANT'S MOTION TO
EXTEND TIME TO FILE POST-
TRIAL MOTIONS**

(Hon. Cindy Jorgenson)

17 Pursuant to LRCiv 7.3(a), Defendant City of Tucson, through undersigned counsel,
18 hereby move the Court for an order extending the current deadline to file post-trial motions
19 from April 19, 2019, to May 9, 2019.

20 Pursuant to Federal Rules of Civil Procedure Rules 50 and 59, Defendants have
21 twenty-eight (28) days from judgment to file a Motion for New Trial, Motion for Directed
22 Verdict and/or Judgment Notwithstanding the Verdict, and/or a Motion to Alter or Amend
23 the Judgment.

24 At the conclusion of trial, the City requested seven (7) days in which to file its post-
25 trial motions. However, the Rules provide for twenty-eight (28) days. Given the
26 transcripts and analysis involved in the City's anticipated motions, the City requests leave
27 to file within the time provided by the Rules, rather than the seven days initially requested.
28 No party will be prejudiced by allowing the additional time, as contemplated by the Rules.

1 Counsel for the City contacted counsel for the Plaintiff to request her consent to the
2 extension, and Plaintiff has no objection.

3 DATED April 16, 2019.

4 MICHAEL G. RANKIN
5 City Attorney

6 By s/ Renee J. Waters
7 Michelle R. Saavedra
8 Renee J. Waters
Principal Assistant City Attorneys

9 **CERTIFICATE OF SERVICE**

10 I hereby certify that on April 16, 2019, I electronically transmitted the attached
11 document to the Clerk's Office using the CM/ECR System for filing and transmittal of a
12 Notice of Electronic Filing to the following CM/ECR registrants:

13 Jeffrey H. Jacobson
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16 *Attorney for Plaintiff*

17 By E. Acosta/bys

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